

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
Squirrels Research Labs LLC <i>et al.</i> , ¹)	Case No. 21-61491
)	(Jointly Administered)
Debtors.)	
)	Judge Russ Kendig

**NOTICE OF MOTION OF DEBTOR AND DEBTOR-IN-POSSESSION SQUIRRELS
RESEARCH LABS, LLC FOR ENTRY OF AN ORDER: (I) AUTHORIZING THE
DEBTOR TO PAY (A) PREPETITION EMPLOYEE WAGES, SALARIES AND
RELATED ITEMS; AND (B) PREPETITION CONTRIBUTIONS TO, AND BENEFITS
UNDER, EMPLOYEE BENEFIT PLANS; AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT on February 17, 2022, the debtors and debtors-in-possession (each a “Debtor” and collectively, the “Debtors”), in the above-captioned Chapter 11 cases, filed the *Motion Of Debtor And Debtor-In-Possession Squirrels Research Labs, LLC For Entry Of An Order: (I) Authorizing The Debtor To Pay (A) Prepetition Employee Wages, Salaries And Related Items; And (B) Prepetition Contributions To, And Benefits Under, Employee Benefit Plans; And (II) Granting Related Relief* (the “Motion”).

Your rights may be affected. You should read the Motion carefully and discuss it with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

Pursuant to Local Rule 9013-1(b), if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then on

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

or before **March 3, 2022**, you or your attorney must file with the Court a written objection explaining your position at:

United States Bankruptcy Court
Office of the Clerk
Ralph Regula Federal Building and U.S. Courthouse
401 McKinley Avenue, SW
Canton, Ohio 44702

You must also serve a copy of your request on the undersigned counsel:

Marc B. Merklin
Julie K. Zurn
Brouse McDowell LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311

*Counsel for the Debtors
and Debtors-in-Possession*

Pursuant to Local Rule 9013-1(d), if you or your attorney do not take these steps, the Court may grant the relief requested without conducting a hearing and without further notice to you.

Dated: February 17, 2022

Respectfully submitted,

/s/ Julie K. Zurn

Marc B. Merklin (0018195)
Julie K. Zurn (0066391)
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*Counsel for the Debtors
and Debtors-in-Possession*

CERTIFICATE OF SERVICE

I, Julie K. Zurn, hereby certify that on February 17, 2022, a true and correct copy of the *Notice of Motion Of Debtor And Debtor-In-Possession Squirrels Research Labs, LLC For Entry Of An Order: (I) Authorizing The Debtor To Pay (A) Prepetition Employee Wages, Salaries And Related Items; And (B) Prepetition Contributions To, And Benefits Under, Employee Benefit Plans; And (II) Granting Related Relief* was served via the court's Electronic Case Filing System on these entities and individual who are listed on the court's Electronic Mail Notice List:

John C. Cannizzaro on behalf of Interested Party Instantiation LLC at
John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com

Christopher Paul Combest on behalf of Creditor Avnet, Inc. at
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John G. Farnan on behalf of Creditor Cincinnati Insurance Company at
jfarnan@westonhurd.com

Robert E. Goff, Jr. on behalf of Creditor Cincinnati Insurance Company at
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Steven Heimberger on behalf of Interested Party SCEB, LLC at sheimberger@rlblp.com,
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Jeannie Kim on behalf of Interested Party Instantiation LLC at
JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com

Marc Merklin on behalf of Debtor Squirrels Research Labs LLC at
mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com

David M. Neumann on behalf of Creditor Envista Forensics, LLC d/b/a AREPA
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David M. Neumann on behalf of Creditor Torea Consulting Ltd. at
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Christopher Niekamp on behalf of Creditor Better PC, LLC at cniekamp@bdblaw.com

Paul J. Schumacher on behalf of Interested Party Ohio Power Company dba American
Electric Power at pschumacher@dmclaw.com, tgross@dmclaw.com

Frederic P. Schwieg at fschwieg@schwieglaw.com

Frederic P. Schwieg on behalf of Trustee Frederic P. Schwieg at fschwieg@schwieglaw.com

Bryan Sisto on behalf of Creditor Carl Forsell at bsisto@fbtlaw.com

Richard J. Thomas on behalf of Creditor Premier Bank at rthomas@hendersoncovington.com, dcambotti@hendersoncovington.com

Joshua Ryan Vaughan on behalf of Creditor Ohio Bureau of Workers Compensation at jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com

Julie K. Zurn on behalf of Debtor Squirrels Research Labs LLC at jzurn@brouse.com, tpalcic@brouse.com

Kate M. Bradley ust44 on behalf of U.S. Trustee United States Trustee at kate.m.bradley@usdoj.gov

And by regular U.S. Mail on February 17, 2022, on the following:

Ohio Power Co. d/b/a AEP Ohio
Attn: Dwight Snowden
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Andrew Waters
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UNDELIVERABLE

Bittware/Molex LLC
Attn: Tricia McCoy
2222 Wellington Ct
Lisle, IL 60532

CliftonLarsonAllen LLP
220 S. 6th Street, Suite 300
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133 River Road
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Donald Ruffatto
420 Fairview Ave, Apt. 107
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Internal Revenue Service
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Internal Revenue Service
Insolvency Group 6
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Cleveland, OH 44199

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201 Superior Ave. East, Suite 441
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Cleveland, OH 44114-1234

Office of U.S. Attorney
Attn: Bankruptcy Section
Carl B. Stokes U.S. Court House
801 W. Superior Avenue, Ste 400
Cleveland, OH 44113

Ohio Attorney General
Collections Enforcement Section
Attn: Bankruptcy Unit
30 E. Broad Street, 14th Floor
Columbus, OH 43215

Ohio Bureau of Workers' Compensation
Attn: Law Section Bankruptcy Unit
PO Box 15567
Columbus, OH 43215-0567

Ohio Department of Job & Family
Svcs
Attn: Legal Support-Bankruptcy
PO Box 182830
Columbus, OH 43218-2830

Ohio Department of Taxation
Attn: Bankruptcy Division
PO Box 530
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Internal Revenue Service
Attn: Deputy Director
1240 E. Ninth Street
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